



March 21, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*; CG Docket No. 02-278; Petition for Expedited Declaratory Ruling of United Healthcare Services, Inc.

Dear Ms. Dortch:

Lydia Security Monitoring, Inc. dba C.O.P.S. Monitoring urges the Federal Communications Commission ("FCC") to rule that restrictions on the use of automated telephone dialing systems in the Telephone Consumer Protection Act ("TCPA") and the FCC's rules do not prevent security alarm monitoring companies such as C.O.P.S. Monitoring from using an automated dialer to call wireless telephone numbers that have been provided to it as contact numbers for notification in connection with an alarm event or from sending security or other alerts to wireless numbers provided for such purpose.

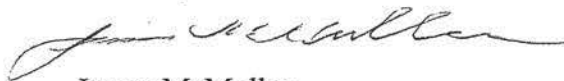
C.O.P.S. Monitoring provides security alarm monitoring services for over 3,500 independent security alarm dealers serving more than one million customers. Purchasers of security alarm monitoring service provide contact numbers so that security alarm monitoring companies can contact them to provide notification of alarm events and alerts of security or other matters in their homes or businesses – e.g., intrusions, fires, etc. A substantial and increasing percentage of security alarm monitoring customers provide wireless numbers as contact numbers. Often, the wireless number is the only telephone number provided. In all or substantially all matters involving security alarm monitoring services, customers want to become aware of the problem as soon as possible regardless of whether they are in their homes or businesses but particularly when they are not there.

Last month, C.O.P.S. Monitoring became the subject of a class action lawsuit that grew out of the fact that, upon receiving an alarm event notification from a customer's security alarm system, it called the wireless number provided by the customer that, without C.O.P.S. Monitoring's knowledge, apparently either had been provided by the customer in error or had been reassigned to an individual different than the customer who originally signed up for alarm monitoring service. As a result of carrying out its contractual obligation to contact the customer about receipt of an alarm event at the customer's premises at the wireless number provided by the customer, C.O.P.S. Monitoring now is open to risk of substantial class action liability.

This lawsuit and others like it appear to be unintended consequences of the TCPA and the FCC's rules. Placing security alarm monitoring companies at risk of materially adverse financial consequences for either (i) performing the service requested and expected by the customers, required by contract and, in many jurisdictions, mandated by law before contacting first responders or municipal emergency operators (911 call centers), or (ii) delaying the communication of an alarm event and other notifications to customers and first responders in order to comply with the TCPA and the FCC's rules and in the process placing customers and others at unnecessary and increased risk of personal injury, property damage and economic harm due to delays in notification makes no sense.

The results to C.O.P.S. Monitoring, other security alarm monitoring companies and customers under the FCC rules are potentially catastrophic for C.O.P.S. Monitoring, other security alarm monitoring companies, customers and other stake holders such as first responders. All stake holders agree that the quicker the notice of a security alarm event is communicated to customers and first responders the less likely it is that there will be loss of life, serious injuries, any material loss or damage to property or material economic loss. The stakes are extremely high. Without an exception for security alarm monitoring companies under the FCC rules, there will be a heavy price to pay in increased loss of life, personal injuries, property loss and damage and economic losses. We urge the FCC to make clear that companies such as C.O.P.S. Monitoring may continue to serve their customers, first responders and others by calling and sending automated alerts to the wireless numbers provided by those purchasing security alarm monitoring services without running the risk of potentially devastating class action litigation.

Sincerely,



James McMullen  
President/COO

cc: Kris Anne Monteith